

7-2 Filed 09/14/2005
Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

SADRICK DONALDSON
Plaintiff,

V.

UNITED STATES OF AMERICA
FEDERAL BUREAU OF PRISONS, ET, AL.
Defendant's.

) C.A. NO. 04-257 ERIE
)
) DISTRICT JUDGE MCLAUGHLIN
) MAGISTRATE JUDGE BAXTER

Copy

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 26 and Rule 34 of the Federal Rules of Civil Procedure, Plaintiff hereby request that the Defendants produce the following documents, for inspection and copying, the documents and tangible things identified below within thirty (30) calendar days of the service of this production of documents request. Please produce the documents to Plaintiff at:

Sadrick Donaldson
Register No: 20102-018
F.C.I. Allenwood
P.O. Box 2000, 4-B
White Deer, PA. 17887-2000

1. All documents that contain, mention, construe, or refer to policies on staff supervision of inmates at F.C.I. McKean. Staff - meaning employees of the Bureau Of Prisons.

2. All documents that contain, mention, construe, or refer to policies on staff responses to inmate-on-inmate threats and sexual harassment at F.C.I. McKean.

3. All documents that evidence, mention, or refer to the assault on Plaintiff by inmate ERIC DRAYTON register no: 31387-037 on August 29, 2003, including but not limited to medical records, incident reports, statements and other investigative materials, and documents relating to subsequent inmate and staff discipline, if any.

4. All documents, on Plaintiff's contents at McKean F.C.I. Center file, including but not limited to disciplinary reports, incident reports, evaluations, criminal justice information, and medical and mental health records.

5. All documents that mention, or refer to inmate ERIC DRAYTON Register No: 31387-037 institutional conduct or disciplinary history, at F.C.I. McKean or any other facility.

6. All other documents sworn or unsworn statements or affidavits that relate to the allegations made in Plaintiff's complaint.

7. All documents, records, notes, drafts, photographs, physical evidence or other records, prepared by (S.I.S.) Special Investigation Services at F.C.I. McKean. And sworn or unsworn statements, on November 1, 2002, through and including the date of your response to this request concerning Plaintiff, and inmate ERIC DRAYTON Register No: 31387-037. Who was involved in the assault on Plaintiff on August 29, 2003.

8. All records, documents, memoranda, record books, logs,

and any other documents on Plaintiff, in the Special Housing Unit at McKean F.C.I. On November 1, 2002 through April 1, 2003. Also from August 29, 2003 through December 1, 2003. When Plaintiff was housed inside the Special Housing Unit.

9. All documents, notes, record books, logs, on Plaintiff's - (cellmates) in the Special Housing Unit on November 2, 2002 until June 5, 2003.

10. All documents, notes, drafts, record book, logs, on staff and (C.O.) Correctional Officer's assigned to work - or on duty inside the (Special Housing Unit) from November 2, 2002 until June 5, 2003, when Plaintiff was living in the Special Housing Unit.

11. All documents, drafts, policies, photographs, policies, procedures, records book, logs or other documents by (Unit Team - BB & BA) of McKean F.C.I. On the Investigation On Plaintiff's protective custody investigation from November 2, 2002 through the date Plaintiff was released from Special Housing Unit.

12. All records, documents, photographs and any other documents by (Unit Team B-B and B-A) of F.C.I. McKean. On the investigation on inmate ERIC DRAYTON coming inside the Unit (B-B).

13. All documents, draft, or any other documents by the (Physcology Department) at F.C.I. McKean on Plaintiff's, from November 1, 2002 through and including the date of December 1, 2003. Also sworn and unsworn statements.

14. All records, notes, sworn and unsworn statements, policies, procedures and any other documents for the (Education Department) at F.C.I. McKean. A list of the inmates names

inside the classroom on August 29, 2003, when Plaintiff was assaulted. And those inmates names that are listed to attend the same classroom as Plaintiff on August 29, 2003.

15. All records, notes, documents, policies, procedures, and any other documents on inmate safety and controlled substances inside the (Education Department - Classrooms) at F.C.I. McKean on August 29, 2003, when Plaintiff was assaulted.

16. All documents, policies, procedures and regulations, for (Safety - Department) at F.C.I. McKean. On chemicals, and safety on chemicals. and how they are controlled inside the institution on August 29, 2003, when Plaintiff was assaulted. And how chemicals are controlled on inmate movements.

17. All documents, records, logs, sworn or unsworn, statements, on Correctional Officer's (C.O.'s) that were assigned to (Unit B-B) at McKean F.C.I. from August 1, 2002 through November 2, 2002. Also from March 1, 2003 until August 29, 2003, when Plaintiff was assigned to the Unit.

18. All documents, records, logs, sworn or unsworn statements, that Correctional Officer's (C.O.'s) that were assigned to (Unit B-B) at McKean F.C.I. from August 1, 2002 through November 2, 2002., also March 1, 2003 until August 29, 2003, on threats against Plaintiff, and inmates coming to the Unit for Plaintiff.

19. All documents, notes, drafts, policies, procedures or any other documents for (Captain - Reich) at F.C.I. McKean concerning the Security & Safety of the Institution from Unit

to the Education building and inside the Education building.
And also on inmate-on-inmate harassment. And any other documents on Plaintiff in protective custody on November 1, 2002 through April 1, 2003.

20. All documents, policies, procedures, regulation documents, for Plaintiff from (Warden - John J. LaManna) relevant to the safety of the institution - and inmate-on-inmate harassment on August 29, 2003. Also on Plaintiff's in protective custody on November 1, 2002 through April 1, 2003. Also the administration remedies on Plaintiff from August 29, 2003 through December 1, 2003. All documents concerning (Hair Relaxer) sold at the institution commissary on August 29, 2003. And the safety of (Hair Relaxer) on August 29, 2003.

21. All documents from (A.D.W.) Grim on Plaintiff from November 2, 2002 to and through your response to this request. Concerning the safety & protection on inmate-on-inmate harassment. Also documents concerning Plaintiff's protective custody status on November 2, 2002 through April 4, 2003.

22. All documents from (A.W.) Assistant Warden of Security at F.C.I. McKean on August 29, 2003 on Plaintiff safety. Also on inmate-on-inmate harassment and protective custody of an inmate with a threat and harassment against him, on November 2, 2002, through April 4, 2003. And the control of chemicals for inmates.

Respectfully Requested,

Date: 3-8-05



Sadrick Donaldson
Reg. No. 20102-018
F.C.I. Allenwood
P.O. Box 2000
White Deer, PA. 17887

PROOF OF SERVICE

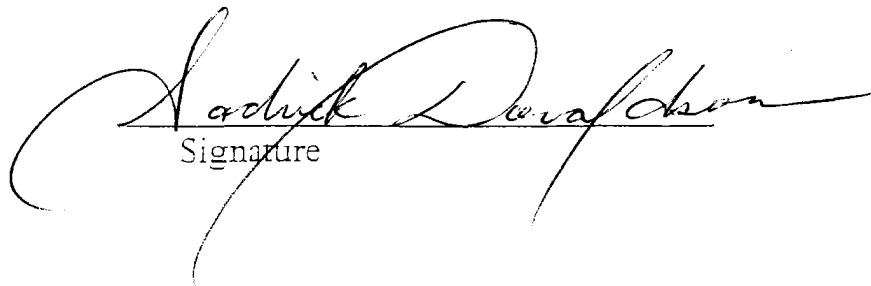
I certify that on 3-8-05 (date) I mailed a copy of this brief and attachments via first class mail to the following parties at the addressess listed below:

Paul Skritich
Asst. U.S. Attorney
700 Grant Street
Pittsburgh, PA 15219

PROOF OF SERVICE FOR INSTITUTIONALIZED OR INCARCERATED LITIGANTS

In addition to the above proof of service all litigants who are currently institutionalized or incarcerated should indicate the following statement on all documents to be filed with this Court:

I certify that this document was given to prison officials on 3-8-05 (date) for forwarding to the District Court I certify under penalty of perjury that the foregoing is true and correct. 28 U.S.C. §1746.


Signature

Dated: 3-8-05